

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN,

Plaintiff,

v.

1:23-cv-09648-JGLC-GWG

THE CITY OF NEW YORK and NEW YORK CITY
POLICE DEPARTMENT, NEW YORK CITY
POLICE DEPARTMENT LIEUTANANT GEORGE
EBRAHIM, NEW YORK CITY POLICY
DEPARTMENT OFFICER CHANDLER CASTRO,
NEW YORK CITY POLICE DEPARTMENT
OFFICER JENNIFER CARUSO, NEW YORK
CITY POLICE DEPARTMENT OFFICER KELVIN
GARCIA, JOHN DOE 1, JOHN DOE 2, JOHN DOE
3, JOHN DOE 4, JANE DOE, (fictitious names
intended to be officers, representatives, agents,
servants of the New York City Policy Department,
individually and in their official capacities, ELON
MUSK, X CORP, ADAM SHARP,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE, upon the accompanying Memorandum of Law, and upon all prior proceedings, pleadings, and filings herein, Defendant ADAM SHARP (“Defendant”) hereby moves this Court at the Courthouse located at the Daniel Patrick Moynihan United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 20C, New York, New York before the Honorable Jessica G. L. Clarke, United States District Judge, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6) to dismiss the Complaint filed by Plaintiff JASON GOODMAN (“Plaintiff”) for failure to state a claim, pursuant to Federal Rule of Civil Procedure 11 imposing a filing injunction barring Plaintiff from filing any additional documents

involving Sharp in this District, and filing any federal district court action (whether *pro se* or otherwise) against Sharp without leave of court, and granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Individual Practices in *Pro Se* Cases of the Honorable Jessica G. L. Clarke, Rule 4(a), and unless otherwise ordered by the Court, papers filed in opposition to the instant motion, if any, must be served and filed upon the undersigned on or before February 1, 2024.

Dated: New York, New York
January 2, 2024

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

Attorneys for Defendant Adam Sharp

/s/ John Mills

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